

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

v.

SAAD EL-DIN RAFIK AL-HARIRI,
BAHAA HARIRI, AYMAN HARIRI,
MOHAMMED HARIRI,
ALI H.KOLAGHASSI, and
HELEN CONLON,

Defendants.

Civil Case No.


1:23-cv-2145-CBA-RML

**AFFIRMATION OF
ZACHARY HOLZBERG, ESQ.
IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

ZACHARY HOLZBERG, an attorney duly admitted to practice law before the Courts of the State of New York and before this Court, affirms the following under penalty of perjury:

1. I am an attorney with the law firm of Derek Smith Law Group, PLLC, the counsel of record for the Plaintiffs Jane Doe 1 and Jane Doe 2, and as such, I am fully familiar with the facts and circumstances contained herein.
2. This Affirmation is submitted in opposition to Defendants' motion to dismiss Plaintiffs' Amended Complaint pursuant to FRCP 12.
3. Attached as Exhibit A to this Affirmation is true and correct copy of Plaintiffs' letter to Judge Phillip Hom in State Court Action 1 dated July 28, 2022.

Dated: October 27, 2023
New York, New York



Zachary Holzberg